

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

CASE NO. 21-CR-00086-JMC

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL HAAK,

Defendant,

\_\_\_\_\_ /

**AGREED MOTION TO CONTINUE PLEA AND SENTENCING**

COMES NOW the undersigned counsel and pursuant to an agreement with Assistant United States Attorney Michael Cunningham, would respectfully request this matter be continued for no sooner than June 7, 2021, or anytime thereafter as is convenient with this Court, and in support thereof would show as follows:

1. The Defendant is charged with an allegation of violation of 48 U.S.C. §46506(2), D.C. Code Section 22-1312.
2. A Plea Conference and Sentencing is currently scheduled for May 7, 2021 at 1:00 p.m. This hearing was scheduled virtually with the consent of all the parties.
3. The facts that give rise to the Defendant's arrest are said to have occurred when he was employed with a national airline. Due to some issues that have arisen with the Defendant's former employer, it is requested that the Plea and Sentencing be rescheduled for some time after June 7, 2021 as is convenient with the Court's schedule.
4. The parties are requesting that due to the COVID situation that the Plea and Sentencing remain scheduled virtually.

5. The undersigned discussed this matter with Assistant United States Attorney Michael Cunningham on April 26, 2021 and Mr. Cunningham indicated the government had no objection to this request and agrees that the matter can remain virtual when rescheduled.

6. The undersigned counsel has previously been admitted to this district pro hac vice.

WHEREFORE, pursuant to an agreement between the parties, it is respectfully requested the virtual Plea and Sentencing be rescheduled no sooner than June 7, 2021 or as otherwise convenient with this Court.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished, by electronic transmission via CM/ECF, to Michael Cunningham, Assistant United States Attorney, 36 S. Charles Street, Suite 400, Baltimore, MD 21201-3119, this 27th day of April, 2021.

Respectfully submitted,

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/s/ Michael Salnick

MICHAEL SALNICK, Fla. Bar #270962